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September 13, 2021

By ECF

Hon. Vernon Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 9/14/2021

Re: Ricardo Castro and Jeff Jackson v. AABC Construction, Inc. et al.
17 Civ. 1205 (VSB) (KNF)

Dear Judge Broderick:

This firm represents Plaintiffs Ricardo Castro and Jeff Jackson in the above-captioned matter. I write, with the consent of counsel for defendant Daniel Sheeri, to request a brief additional extension of the parties' time to file pretrial submissions. Counsel for Mr. Sheeri has advised me that he anticipates providing the undersigned with Mr. Sheeri's portion of the joint pre-trial order this afternoon, but the press of other business will prevent me from being able to combine the parties' respective sections into a single document before the close of business today, which is the current filing deadline. Moreover, counsel for all parties wish to review the combined document with their respective clients thereafter, and to meet and confer concerning any disputes that might arise thereafter before submitting the JPTO to the Court, which process will be delayed by the September holidays and upcoming planned personal travel.

Accordingly, I respectfully request:

- (1) That the deadline for submission of a joint pre-trial order and of motions *in limine*, currently set for today, be extended through and including October 1, 2021; and
- (2) That the deadline for submission of oppositions to motions *in limine*, proposed voir dire questions, proposed verdict sheets, and proposed jury instructions be extended through and including October 15, 2021.

Although the Court has previously granted several such extensions, it is respectfully submitted that, because this matter is not currently scheduled for trial, no prejudice will result from this additional adjournment.

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Thank you for your consideration of this letter.

Very truly yours,

MOSKOWITZ & BOOK, LLP

By:



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cc: All counsel of record, via ECF